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Submitting Organization: SECTOR SAN FRANCISCO
OpFac: 11-37270
COE #: 1944

Event Name: Safe Seas 2006 PREP Exercise
Event Type: Exercise
Type of Mission: Marine Environmental Protection
Type of Exercise: FTX - Field Training Exercise

Event Cost Estimated

AFC-30: \$1,000.00
AFC-90: \$0.00
CERCLA: \$0.00

Event Cost Actual

AFC-30: \$1,870.00
AFC-90: \$0.00
CERCLA: \$0.00

Start Date: 11 Jul 2006 **End Date:** 10 Aug 2006

General Description:

In order to test the Area Contingency Plan, the Region IX Regional Response Plan, and Harley Marine Services Vessel Response Plan, NOAA, Coast Guard and numerous other federal, state and local agencies jointly conducted a multi-part NPREP between July 11th and August 10th. The NPREP was divided into three distinct exercises beginning with a Table Top Exercise (TTX) focusing on initial spill notifications, a Command Post Exercise (CPX) focusing largely on an initial Incident Command Post standup, and ended in a Field Training Exercise (FTX) with extensive technology demonstrations and field deployments.

Operational Data:

This exercise depicted a collision between a bulk freight cargo ship in-bound San Francisco Bay and a tug and barge out-bound to Los Angeles. Given the location of the collision, the spill had the potential to impact the Cordell Bank, Gulf of Farallones, and Monterey Bay national marine sanctuaries, along with Marin, San Francisco, San Mateo, and Santa Cruz counties. The length of the exercise and eventual extent of the spill allowed Safe Seas to address a wide array of objectives, including notifications, coordination of an extensive Incident Command Post, decisions about dispersant use and places of refuge, and technology and field deployments.

Support Data:

There were no major support issues with this exercise. The Logistics Section and Finance and Administration Sections were minimally staffed due to the heavy control lift required to keep those positions employed and engaged. Due to the size and complexity of the exercise, it was determined that the exercise would have benefited from additional

players in key Logistics Section roles including Medical Unit Leader, Facilities Unit Leader, and Security Manager. A Communications Plan was created by members of the design team to address the numerous sea, air and land assets scheduled for deployment in August. Extensive interagency coordination was required to complete a robust Communications Plan, as each participating agency had its own distinct command and control procedures. Though only \$1,870 was spent in support of this exercise, the process allowed Sector San Francisco and the exercise design team to identify various Incident Management and Sector Command Center response equipment shortfalls (communications equipment, audio/visual, ICS support) that will continue to require additional funding.

Location of Operation:

Field operations were conducted in the northern and southeastern-most areas of the precautionary area at the approaches to San Francisco Bay, on beaches in southern Marin and San Francisco County, and in Half Moon Bay.

Location of Personnel:

1. All July TTX and CPX activities were conducted at the Lower Fort Mason Convention Center in the Golden Gate Room. 2. The August FTX Incident Command Post was located at the University of San Francisco at Mission Bay Conference Center.

Objectives and Major Lessons:

The following major objectives were set and met during Safe Seas '06: 1. Evaluate the ability to initiate notifications identified in the Area Contingency Plan and in the RP's (Barge) Vessel Response Plan prior to establishing the UC. 2. Evaluate the ability to establish a Unified Command, including use of the National Incident Management System (NIMS), and complete the planning cycle through the planning meeting. 3. Demonstrate the ability to conduct initial vessel assessments (Barge) and develop the appropriate plans including: Salvage Plan; Damage Control Plan; Waterside Firefighting requirements; Transit Plan (to include place of refuge); and a preliminary disposal plan. 4. Demonstrate the ability to conduct initial environmental assessments and forecasts, and develop the appropriate plans including: shoreline protection; wildlife protection; cultural resource protection; dispersant use; and place of refuge. 5. Demonstrate the ability to deploy equipment to assess environmental conditions, protect environmentally sensitive areas, and to treat spilled oil. 6. Demonstrate the ability of NOAA, DOI, OSPR, and the Responsible Party to initiate and conduct joint Natural Resource Damage Assessment activities.

Limitations and Casualties:

None.

Participants:

Primary participants included: Coast Guard (Sector San Francisco, CGC ASPEN, Pacific Strike Team, Air Station San Francisco, District Eleven, CAMSPAC, MLCPAC, Pacific Area IMAT, and Headquarters), NOAA (National Ocean Service, National Marine Fisheries Service, Office of Oceanic and Atmospheric Research, National Marine Sanctuaries, National Environmental Satellite, Data and Information Service, and NOAA Marine and Aviation Operations), Department of the Interior (Bureau of Land

Management, Minerals Management Service, National Parks Service, Fish and Wildlife Service, Office of Environmental Policy and Compliance), U.S. Air Force Reserve, State of California (Department of Fish and Game, Office of Spill Prevention and Response, State Lands Commission, State Parks, Office of Emergency Services), Genwest Systems, Inc., Regional Association for Ocean Observing in Central and Northern California, Alameda County Sheriff, San Francisco County Office of Emergency Services, and University of California (Bodega Marine Laboratory). Playing as the primary responsible party was Harley Marine Services, which incorporated the following organizations: Marine Spill Response Corporation, Resolve Marine Group (salvor), Parker Diving Service, ENTRIX Inc., Thomas Miller Incorporated, and Keesal, Young and Logan. The responsible party for the freight ship Blue Harp was played by Craig O'Connor, from the Office of General Counsel for Natural Resources, NOAA. Additional participants included: Federal Emergency Management Agency, U.S. Public Health Service, National Transportation Safety Board, California Maritime Academy, University of New Hampshire, University of New England, Virginia Aquarium, Alaska SeaLife Center, Texas Marine Mammal Stranding Network, San Francisco Department of Public Health, San Francisco Marine Exchange, Port of San Francisco, Riverhead Foundation for the Preservation of the Marine Environment, Cape Cod Stranding Network, the Marine Mammal Center, and the Pacific States/British Columbia Oil Spill Task Force. Foreign diplomats visited from Vietnam and the Galapagos Islands.

Add additional comment

Title of Lesson Learned: Unified Command

Recommended Action: Recommended follow-on action District [CCGD 11]

Type of Contingency: OIL AND HAZARDOUS SUBSTANCE RESPONSE

ICS: 0 UNIFIED COMMAND

Core Component: Staff Mobilization

Recommended Action Area: Policy

Start Date: 11 Jul 2006 **End Date:** 10 Aug 2006

Observation:

Composition of the Unified Command (UC) in an incident involving multiple jurisdictions with multiagency involvement was the subject of much debate and disagreement between Federal and State agencies. The disagreement revolved around conflicting interpretations of plans and/or conflicting guidance in the Regional Contingency and the National Incident Management System about including jurisdictional authorities beyond the State of California, Federal On-Scene Coordinator (FOSC) and Responsible Party into the UC.

Discussion:

The Department of the Interior (DOI) and the National Oceanic and Atmospheric Administration (NOAA) were not initial members of the Unified Command. DOI and NOAA requested participation in the UC due to their jurisdictional authority (through National Parks and National Marine Sanctuaries) over geographic areas significantly affected by the incident and because they felt they were not getting sufficient information during the CPX portion of the exercise. After being included in the UC, DOI and NOAA were introduced under an "advisory role," which created consternation among their state

representatives. The difference between agency natural resource trustee responsibilities under the National Contingency Plan and agencies jurisdictional authority is not generally understood. The balance between including agencies with significant jurisdictional authority in the UC and maintaining an efficient command structure is a concern to be considered in determining the optimum UC composition.

Lesson Learned:

The UC should clarify the role and authority of both resource trustee responsibilities and jurisdictional authorities and communicate this clearly to the ICP.

Recommendation:

The Regional Response Team (RRT) should continue to examine guidance from the Department of Homeland Security and the National Response Team regarding the composition of the UC to determine if the Area Contingency Plan and Regional Contingency Plan require revision. Prior to implementing UC composition changes to these plans, the RRT should consult with the Area Committees and EPA and USCG FOSCs to ensure that their concerns are addressed. If this is also an issue for other regions, the RRT should consult with the National Response Team and/or NIMS Integration Center for clarification and alignment. The role of jurisdictional authorities in the Unified Command should be included in ICS training classes and materials.

Comment:

Add additional comment

Title of Lesson Learned: Dispersant Application Cycle

Recommended Action: None, information only

Type of Contingency: OIL AND HAZARDOUS SUBSTANCE RESPONSE

ICS: 2 PLANNING SECTION

Core Component: Protection/Countermeasures

Recommended Action Area: Performance

Start Date: 11 Jul 2006 **End Date:** 10 Aug 2006

Observation:

The end-to-end dispersant planning was very beneficial and provided a good reference for the California response community.

Discussion:

From all accounts, this process went very well; environmental tradeoffs were considered, the RRT convened, the UC authorized use, the resources were ordered, the application was planned using the Dispersant Mission planner and the California Dispersant Plan, dispersants were applied, the results were monitored using SMART, and the information was relayed back to the command post. It should be noted that the dispersant usage decision was made twice during this exercise, once using the pre-approval process and once using the RRT approval-required process.

Lesson Learned:

Walking through the entire dispersant application process is a valuable experience and provides participants with not only a big picture understanding, but also with a detail

level of knowledge of what specific tasks and resources need to be accounted for in order to successfully and rapidly apply dispersants. Specific aspects of dispersant mission planning and monitoring procedures would benefit from re-examination in light of new techniques and technologies. In addition, the USCG rulemaking for OSRO dispersant regulations may require reexamination of the RCP/ACP dispersant approval processes.

Recommendation:

The actual deployment of dispersant application and monitoring equipment should occur during exercises as often as is practicable. An additional dispersant-specific requirement should be considered for inclusion in the PREP Guidelines.

Comment:

Add additional comment

Title of Lesson Learned: Dispersant RRT-Approval Process

Recommended Action: None, information only

Type of Contingency: OIL AND HAZARDOUS SUBSTANCE RESPONSE

ICS: 2 PLANNING SECTION

Core Component: Protection/Countermeasures

Recommended Action Area: Performance

Start Date: 11 Jul 2006 **End Date:** 10 Aug 2006

Observation:

Establishment of a Dispersant Workgroup within the Environmental Unit allowed for buy-in by Natural Resource Trustees and limited controversy during the Regional Response Team (RRT) approval process.

Discussion:

The Dispersant Workgroup formed within the Environmental Unit was composed of natural resource specialists and key natural resource managers and was facilitated by technical experts experienced in dispersants and environmental trade-offs. This approach provided a forum for the presentation of incident-specific information, the identification and discussion of environmental trade-offs and the development of recommendations to minimize/mitigate environmental impacts of the dispersant application(s) under consideration.

Lesson Learned:

Facilitated discussion of incident-specific dispersant issues among natural resource trustees prior to discussion by the RRT simplified subsequent discussions and the overall approval process.

Recommendation:

Area Committees and the RRT should consider clarifying who should be included in discussions of the Net Environmental Benefits Analyses of dispersant applications during the RRT approval process.

Comment:

Add additional comment

Title of Lesson Learned: Pre-Exercise Training

Recommended Action: None, information only

Type of Contingency: OIL AND HAZARDOUS SUBSTANCE RESPONSE

ICS: 0 UNIFIED COMMAND

Core Component: Operate within management system

Recommended Action Area: Performance

Start Date: 11 Jul 2006 **End Date:** 10 Aug 2006

Observation:

The training provided in the time leading up to Safe Seas was highly beneficial to exercise participants and to the goal of the exercise.

Discussion:

ICS 100, 200, 700 and 800 training, shoreline cleanup assessment teams training, and “short courses” were conducted in the months, weeks and days prior to Safe Seas 2006. The training was open to all participants, and they were able to choose from multiple topics for the half day “short courses.” Topics ranged from dispersant application, environmental tradeoffs, marine debris, media in an ICS context, natural resource damage assessment, over flight observations, and wildlife handling. Covering these topics with the participants in advance of the exercise allowed the evaluators to focus more on the objectives of the exercise and less on the skills and knowledge of the players.

Lesson Learned:

Training should be a year-long continual process, however training conducted separately but in conjunction with an exercise is beneficial to participants in that it provides budgetary efficiencies for out-of-town travelers (for training provided within days of the exercise), improves response readiness by direct application of training, and provides first responders time to interface with other agencies and learn stakeholder perspectives. Most importantly, it allows the exercise to serve as a rigorous test of the associated plans, but not necessarily a test of the response in terms of the responder’s actual preparedness.

Recommendation:

Whenever possible, exercise design team should focus on providing relevant training in the days, weeks and months prior to an exercise.

Comment:

Add additional comment

Title of Lesson Learned: Law Enforcement

Recommended Action: Recommended follow-on action Unit

Type of Contingency: OIL AND HAZARDOUS SUBSTANCE RESPONSE

ICS: 1.3.6 Law Enforcement Group

Core Component: Staff Mobilization

Recommended Action Area: Performance

Start Date: 11 Jul 2006 **End Date:** 10 Aug 2006

Observation:

Law Enforcement personnel participating in the exercise were unclear of their role in an ICS response.

Discussion:

The Law Enforcement branch of the Operations Section thought that their role was to conduct an investigation and provide security for their respective agencies. IAW the ICS, they were supposed to work together to provide a comprehensive law enforcement plan to ensure safety of all responders in the field, especially beach responders.

Lesson Learned:

Need to clarify role of law enforcement responders.

Recommendation:

Conduct ICS position specific training for law enforcement personnel.

Comment:

Add additional comment

Title of Lesson Learned: Situation Unit

Recommended Action: Recommended follow-on action Unit

Type of Contingency: OIL AND HAZARDOUS SUBSTANCE RESPONSE

ICS: 2.1 Situation Unit

Core Component: Personnel Support

Recommended Action Area: Performance

Start Date: 11 Jul 2006 **End Date:** 10 Aug 2006

Observation:

Situation Unit was not producing a timely, comprehensive display or providing necessary information to the ICP.

Discussion:

Situation Unit was not proactive in collecting data, they were waiting for data to come to them. When they did not receive data, they made displays with old data which was not providing the ICP with the current status of the response.

Lesson Learned:

Section Chiefs can schedule data calls twice a day for Situation Unit to obtain information which will be provided to all sections. Also, each division/branch/section can have an inbox and outbox to put outgoing and incoming data in as it becomes available.

Recommendation:

Situation Unit Leader (SUL) training needs to be provided to prospective SUL's so they become more familiar with their role. Ultimately, it is the responsibility of the Planning Section Chief to ensure the Situation Unit operates at a satisfactory level. Additionally, local responders need to capitalize on training opportunities from other drills and exercises to improve skills.

Comment:

Add additional comment

Title of Lesson Learned: HAZWOPER Training

Recommended Action: Recommended follow-on action Unit

Type of Contingency: OIL AND HAZARDOUS SUBSTANCE RESPONSE

ICS: 0.4.2 Safety

Core Component: Assessment

Recommended Action Area: Plans

Start Date: 11 Jul 2006 **End Date:** 10 Aug 2006

Observation:

Prior to the exercise, field personnel participating in SCAT/NRDA teams were confused as to what level of HAZWOPER training would be required for them in an actual response. Some field personnel who participated in the exercise did not complete the level of HAZWOPER training required in an actual response.

Discussion:

There appears to be confusion with respect to the level of training that is required for certain field personnel, which could transfer over to an actual response and pose a potential safety hazard. Further clarification is needed.

Lesson Learned:

The Area Contingency Plan should specify the level of training that is required for each specific field function (NRDA, SCAT, Beach Watch volunteers), and this information should be widely disseminated.

Recommendation:

Area Committees should research this topic to determine if these training levels have already been pre-designated. The appropriate information should be published in the ACP or RCP and the training requirement should be clearly communicated to potential field team members and their agencies.

Comment:

Add additional comment

Title of Lesson Learned: Places of Refuge

Recommended Action: Recommended follow-on action Unit

Type of Contingency: OIL AND HAZARDOUS SUBSTANCE RESPONSE

ICS: 1.3.2 Salvage Group

Core Component: Disposal

Recommended Action Area: Plans

Start Date: 11 Jul 2006 **End Date:** 10 Aug 2006

Observation:

It was unclear which section of the ICP had the lead on the Places of Refuge issue, because it ended up being split between liaison, operations, and planning, resulting in

some duplication of efforts.

Discussion:

Several sections of the ICP were working on different aspects of the Places of Refuge issue, however someone needed to take the lead to speed up the process and look at the big picture. Pre-planning and discussion would have helped smooth out the process, especially with local stakeholders.

Lesson Learned:

One point of contact in the ICP should be the lead on the Places of Refuge issue. The Places of Refuge section in the RCP/ACP needs to be further developed. Include local stakeholders in any future Places of Refuge discussions to improve relations and educate them on this potential issue.

Recommendation:

Area Committees and the Regional Response Team need to determine which ICS section should take the lead on managing a place of refuge request or option. The RRT should ensure Places of Refuge plans are consistent along the west coast to prevent potential jurisdictional issues. Area Committees should include vital information on potential harbors of refuge to expedite the process. Also, outreach should be made to local stakeholders to ensure they are included in the decision making process.

Comment:

Add additional comment

Title of Lesson Learned: SCAT and NRDA

Recommended Action: Recommended follow-on action Unit

Type of Contingency: OIL AND HAZARDOUS SUBSTANCE RESPONSE

ICS: 2.1.2 Field Observer

Core Component: Assessment

Recommended Action Area: Policy

Start Date: 11 Jul 2006 **End Date:** 10 Aug 2006

Observation:

NRDA personnel were integrated into SCAT teams to obtain information, which was inefficient use of personnel.

Discussion:

NRDA personnel were assigned to collect data in the field with SCAT teams, which slowed down the SCAT teams preventing them from completing their mission. Also, the majority of NRDA personnel should be located outside the ICP with a NRDA representative located in the ICP.

Lesson Learned:

NRDA should ask SCAT teams for specific data before they deploy which will allow NRDA to conduct their assessment without slowing down the shoreline assessment process. An alternate course of action would be to send out separate NRDA teams.

Recommendation:

NRDA personnel should not be assigned to SCAT teams, also most NRDA personnel should be located outside the ICP.

Comment:

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Title of Lesson Learned: Sensitive Site Assessment: Crissy Field

Recommended Action: Recommended follow-on action Unit

Type of Contingency: OIL AND HAZARDOUS SUBSTANCE RESPONSE

ICS: 1.2.1 Protection Group

Core Component: Protection/Countermeasures

Recommended Action Area: Plans

Start Date: 11 Jul 2006 **End Date:** 10 Aug 2006

Observation:

During the deployment of the site strategy near Crissy Field Tidal Marsh (2-403-A), the deployment team noted areas for improvement in the current strategy.

Discussion:

None.

Lesson Learned:

Any potential improvements to Area Contingency Plan site strategies should be incorporated into the plan for future responses.

Recommendation:

The San Francisco Bay & Delta Area Committee should evaluate the Crissy Field Tidal Marsh site strategy improvements for incorporation into the Area Contingency Plan.

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